

1 Danny J. Horen, Esq.
2 NV Bar No. 13153
3 Kazerouni Law Group, APC
4 7854 W. Sahara Avenue
5 Las Vegas, NV 89117
6 Telephone: (800) 400-6808x7
7 Facsimile: (800) 520-5523
8 danny@kazlg.com

9 David H. Krieger, Esq.
10 NV Bar No. 9086
11 HAINES & KRIEGER, LLC
12 8985 S. Eastern Avenue, Suite 130
13 Henderson, Nevada 89123
14 Phone: (702) 880-5554
15 FAX: (702) 385-5518
16 dkrieger@hainesandkrieger.com

17 *Attorneys for Plaintiff*

18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA
20

21 SARAH K. ASENJO,
22 Plaintiff,
23 vs.
24 BANK OF AMERICA, N.A. and
25 EXPERIAN INFORMATION
26 SOLUTIONS, INC.
27 Defendants.

Case No. 2:15-CV-00286-JCM-PAL
**STIPULATION AND [PROPOSED]
ORDER TAKING BANK OF
AMERICA, N.A.'S MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT OFF CALENDAR**

28 Plaintiff Sarah Asenjo ("Plaintiff") and Defendant Bank of America, N.A.
("Bank of America"), by and through their attorneys of record, hereby stipulate as
follows:

1 WHEREAS, on May 4, 2015, defendant Bank of America filed a Motion to
2 Dismiss Plaintiff's Complaint (Docket #9);

3 WHEREAS, on May 20, 2015, Plaintiff filed a First Amended Complaint
4 ("FAC") (Docket #12);

5 WHEREAS, on May 21, 2015 defendant Experian Information Solutions, Inc.
6 ("Experian") filed a Motion to Strike the FAC on the grounds that it was untimely
7 filed without leave of Court (Docket #13);

8 WHEREAS, in light of the FAC being filed, Bank of America agrees to
9 withdraw its Motion to Dismiss without prejudice to re-file in the event that the Court
10 grants Experian's Motion to Strike;

11 WHEREAS, Plaintiff and Bank of America agree that Bank of America shall
12 have up to and including June 12, 2015 to file a responsive pleading to the FAC;

13 THEREFORE, Plaintiff and Bank of America hereby agree that Bank of
14 America's Motion to Dismiss Plaintiff's Complaint (Docket #9) is taken off-calendar
15 without prejudice, and Bank of America's response to Plaintiff's FAC is due on or
16 before June 12, 2015.

17
18 **IT IS SO STIPULATED.**

19 DATED: May 26, 2015

20 AKERMAN LLP

21
22 /s/ Matthew Knepper
23 Matthew Knepper, Esq.
24 1160 Town Center Drive, Ste. 330
25 Las Vegas, NV 89144
matthew.knepper@akerman.com
Attorneys for BofA

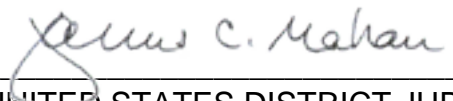
KAZEROUNI LAW GROUP, APC

26
27 /s/ DANNY J. HOREN
28 DANNY J. HOREN, ESQ
7854 W. Sahara Avenue
Las Vegas, NV 89117
danny@kazlg.com
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED:

1. Bank of America's Motion to Dismiss Plaintiff's Complaint (Dkt. No. 9) is withdrawn without prejudice;
 2. Bank of America has up to and including June 12, 2015 to respond to Plaintiff's First Amended Complaint (Dkt. No. 12).
- DATED June 2, 2015.


UNITED STATES DISTRICT JUDGE